

REMARKS

Upon entering the above amendments, claims 1 to 33 will be pending with claims 1, 12, 22, and 33 being independent. Claims 12, 17, 19, and 22 have been amended to clarify the implicitly claimed distinction between the navigation hierarchies of the different application sources and the united navigation hierarchy created from these different application source hierarchies. A limitation relating to merging of nodes related to a similar issue has been included in claim 12. This limitation is supported by the original specification, at least at paragraphs 0057 and 0058. Claim 33 has been added and is fully supported by the original specification, at least at paragraphs 0025, 0026 and 0058. No new matter is added with these amendments. Reconsideration and allowance of the above-referenced application are respectfully requested.

Rejections under 35 USC § 102

Claims 1-32 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Polizzi, U.S. Patent No. 6,643,661B2 (hereinafter "Polizzi"). This rejection is respectfully traversed. For a valid rejection under 35 U.S.C. § 102(e), a reference must describe each and every limitation of the claimed invention. It is respectfully submitted the Office has failed to meet this burden based on the disclosure of Polizzi for at least the reasons discussed below.

The pending rejections of Claims 1 and 22 are traversed because Polizzi fails to disclose a method of uniting navigation hierarchies from different application sources into a united navigation hierarchy. The Office has alleged that Polizzi's statement that "objects that are stored in the repository 235 are arranged in a hierarchy called categories," (Col. 5, lines 64-66) anticipates the limitation in Claims 1 and 22 of "uniting navigation hierarchies from different application sources." It is respectfully submitted that this characterization is in error. Polizzi describes a portal system (120) that includes a network interface (105) featuring a web client 115 via which one or more users may access data in one or more databases. The portal system performs lookup functions on data stored in the databases in response to user queries. In Polizzi, different application source hierarchies are not united into a united navigation hierarchy. Rather, an internal hierarchy is stored in the data repository (235) of the portal system (120) that allows lookup of data from numerous databases. The hierarchies discussed in Polizzi are created within the portal system itself (note the reference in Col 5, line 65 to the repository which is a component of the portal). In contrast, Claims 1 and 22 recite that multiple hierarchies created by

different applications are combined into a united navigation hierarchy that is used to provide a unified navigation area presenting a homogeneous interface through which a user may transparently access information from the different application sources. At least for these reasons, the pending rejection under 35 U.S.C. § 102(e) of claims 1 and 22 and any claims that depend therefrom should be withdrawn.

Further with regards to claims 4 and 25, it is respectfully submitted the Office's allegation that Polizzi discloses "accepting connectors for the different application sources comprises receiving a registration request from a connector for a given application" is incorrect. Polizzi discloses that a user may add an object to a favorites list or may create a list of favorite channels. Polizzi does not, however, disclose or suggest that a registration request is accepted from a connector for a given application. For at least this reason as well as those noted above, Claims 4 and 24 are not anticipated by Polizzi, and the pending rejection under 35 U.S.C. § 102(e) of claims 4 and 24 and any claims that depend therefrom should be withdrawn.

It is also respectfully submitted that claims 8 and 29 are not anticipated by Polizzi. Polizzi does not disclose merging at least two navigation objects based on a merge identifier. The Office alleges that the passage at Col 22, lines 33-36 as well as Figure 10 disclose that a user may merge objects onto a display area. However, even assuming that this assertion is true, Polizzi nonetheless fails to anticipate claims 8 and 29, at least because no disclosure of the use of a merge identifier for merging navigation objects is provided. For at least this reason as well as those noted above for claims 1 and 21, claims 8 and 29 are not anticipated by Polizzi, and the pending rejection under 35 U.S.C. § 102(e) of claims 8 and 29 and any claims that depend therefrom should be withdrawn.

Claims 12 and 19 have been amended to include the limitation that the portal system unites application source hierarchies into a united navigation hierarchy. For at least this reason, it is respectfully submitted that Claims 12 and 19 and all claims that depend therefrom are not anticipated by Polizzi and the pending rejections of these claims should be withdrawn.

It is further submitted that additional limitations present in dependent claims 13 and 14 are not anticipated for the reasons discussed above in regards to claims 4 and 25 -- specifically, Polizzi discloses neither that connector identifiers are generated by the navigation connectors (Polizzi discloses creation of such links by user action) nor that navigation nodes include merge identifiers (Polizzi discloses that merging of navigation information occurs in response to user

input). For at least these reasons, the discussed claims and those that depend therefrom should be in condition for allowance.

New claim 33 recites several of the above-discussed limitations and is therefore respectfully submitted to be patentable over Polizzi. Favorable action is requested.


CONCLUSION

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment. Applicant asks that all claims be allowed.

If there are any questions regarding these amendments and remarks, the Examiner is encouraged to contact the undersigned at the telephone number provided below. Enclosed is a check for \$250.00 for one additional independent claim. No additional fee is due, however, the Commissioner is hereby authorized to charge any additional fees that may be due, or credit any overpayment of same, to Deposit Account No. 50-0311, Reference No. 34874-073-UTIL/2003P00062US.

Respectfully submitted,

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Michael D. Van Loy
Reg. No. 52,315

Address all written correspondence to:
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.
9255 Towne Centre Drive, Suite 600
San Diego, CA 92121
Customer No. 64280
Phone: (858) 320-3000
Fax: (858) 320-3001